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8 Attorneys for Defendant SPROUTS FARMERS  
MARKET, INC.  
9  
10

11 **UNITED STATES DISTRICT COURT**  
12 **CENTRAL DISTRICT OF CALIFORNIA – SOUTHERN DIVISION**  
13

14 ROBERT COHEN, individually and on  
behalf of all others similarly situated,

15 Plaintiff,  
16

17 vs.

18 SPROUTS FARMERS MARKET, INC.,  
and DOES 1 through 10, inclusive, and  
each of them,

19 Defendants.  
20  
21  
22  
23

CASE NO: 8:22-CV-01837

Honorable  
Courtroom

**STIPULATION TO EXTEND TIME  
TO RESPOND TO INITIAL  
COMPLAINT BY NOT MORE THAN  
30 DAYS (L.R. 8-3)**

Complaint Served: September 8, 2022  
Current Response Date: October 14, 2022  
New Response Date: November 11, 2022  
Trial Date: None Set

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1 The parties in the above-entitled matter, by and through their undersigned counsel,  
2 hereby stipulate and agree as follows:

3 WHEREAS, on September 6, 2022, Plaintiff Robert Cohen (“Plaintiff”)  
4 commenced an action against Defendant Sprouts Farmers Market, Inc. (“Defendant”) in  
5 the Superior Court of the State of California for the County of Los Angeles, Case No. 30-  
6 2022-01279027-CU-NP-CXC (the “State Court Action”);

7 WHEREAS, on September 8, 2022, Plaintiff caused the Summons and Complaint  
8 in the State Court Action to be served on Defendant via its registered agent for service of  
9 process;

10 WHEREAS, on October 7, 2022, pursuant to 28 U.S.C. sections 1331, 1441, and  
11 1446, Defendant removed the State Court Action to this Court based on federal question  
12 jurisdiction;

13 WHEREAS, under Federal Rule of Civil Procedure 81(c)(2)(C), Defendant’s  
14 answer, motion to dismiss, or other response to Defendant’s Complaint is currently due on  
15 October 14, 2022;

16 WHEREAS, counsel for Plaintiff and Defendant have met and conferred, and  
17 Plaintiff has granted Defendant an extension of not more thirty (30) days of its time to  
18 answer, move to dismiss, or otherwise respond to the Complaint; and

19 WHEREAS, Defendant has not previously requested, nor has Plaintiff previously  
20 granted, an extension of Defendant’s time to respond to the Complaint, and Defendant is  
21 not waiving any defenses by way of this stipulation;

22 IT IS HEREBY STIPULATED AND AGREED that Defendant shall have an  
23 extension of time up to and including November 11, 2022, to respond to Plaintiff’s  
24 Complaint.

1 DATED: October 7, 2022

LAW OFFICES OF TODD M. FRIEDMAN, P.C.

2  
3 By: /s/Thomas E. Wheeler

Todd M. Friedman

4 Adrian R. Bacon

Meghan E. George

5 Thomas E. Wheeler

Attorneys for Plaintiff Robert Cohen

6  
7  
8 DATED: October 7, 2022

DORSEY & WHITNEY LLP

9  
10 By: /s/ Faisal M. Zubairi

Faisal M. Zubairi

11 Isaac M. Gabriel

Navdeep K. Singh

12 Jessica M. Leano

Attorneys for Defendant Sprouts Farmers  
Market, Inc.

**PROOF OF SERVICE****STATE OF CALIFORNIA, COUNTY OF ORANGE**

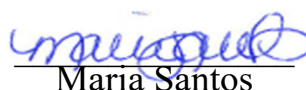
I am employed in the City of Costa Mesa, County of Orange, State of California. I am over the age of 18 years and not a party to the within action. My business address is 600 Anton Boulevard, Suite 2000, Costa Mesa, California 92626-7655. On October 11, 2022, I served the documents named below on the parties in this action as follows:

**DOCUMENT(S) SERVED:** **STIPULATION TO EXTEND TIME TO RESPOND TO INITIAL COMPLAINT BY NOT MORE THAN 30 DAYS (L.R. 8-3)**

**SERVED UPON:** Todd M. Friedman  
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*Attorneys for Plaintiff*

- ☒ **(VIA U.S. MAIL)** I caused each such envelope, with postage thereon fully prepaid, to be placed in the United States mail at Costa Mesa, California. I am readily familiar with the practice of Dorsey & Whitney LLP for collection and processing of correspondence for mailing, said practice being that in the ordinary course of business, mail is deposited in the United States Postal Service the same day as it is placed for collection.
- ☐ **(VIA ELECTRONIC MAILING SERVICE)** Complying with CCP Section 1010.6, my electronic business address is [santos.maria@dorsey.com](mailto:santos.maria@dorsey.com) and I caused such document(s) to be electronically served to the interested parties at the e-mail addresses indicated below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmissions were unsuccessful.
- ☐ **(VIA PERSONAL SERVICE)** I delivered to an authorized courier or driver authorized by Legal Solution Attorney Service, Inc. to receive documents to be delivered on the same date. A proof of service signed by the authorized courier will be provided upon request.
- ☐ **(VIA FEDERAL EXPRESS)** I am readily familiar with the practice of Dorsey & Whitney LLP for collection and processing of correspondence for overnight delivery and know that the document(s) described herein will be deposited in a box or other facility regularly maintained by Federal Express for overnight delivery.
- ☒ **(FEDERAL)** I declare that I am employed in the office of a member of the bar of this Court, at whose direction this service was made.

Executed on October 11, 2022, at Irvine, California.

  
 Maria Santos